

Baker & Hostetler LLP

45 Rockefeller Plaza

New York, New York 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Donna A. Tobin

Email: dtobin@bakerlaw.com

Kimberly M. Maynard

Email: kmaynard@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ELBERT R. BROWN TRUST;

VIOLA BROWN TRUST;

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05398 (SMB)

DO STAY INC.;

ELBERT BROWN, in his capacities as CREATOR
and TRUSTEE of the ELBERT R. BROWN
TRUST, and INDIVIDUALLY as BENEFICIARY
of the ELBERT R. BROWN TRUST; and

VIOLA BROWN, in her capacities as CREATOR
and TRUSTEE of the VIOLA BROWN TRUST,
and INDIVIDUALLY as BENEFICIARY of the
VIOLA BROWN TRUST,

Defendants.

STIPULATION EXTENDING TIME TO SELECT A MEDIATOR

This Stipulation Extending Time to Select a Mediator (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must select a mediator in the above-captioned case is extended up to and including October 9, 2015.

The purpose of this Stipulation is to provide time for the Parties to resolve this matter prior to engaging in and incurring the costs and expenses of mediation.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the

same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: September 23, 2015

BAKER & HOSTETLER LLP

By: /s/ Donna A. Tobin
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Donna A. Tobin
Email: dtobin@bakerlaw.com
Kimberly M. Maynard
Email: kmaynard@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

SEEGER WEISS LLP

By: /s/ Parvin K. Aminolroaya
77 Water Street
New York, New York 10005
Telephone: (212) 584-0700
Facsimile: (212) 584-0799
Stephen A. Weiss
Email: sweiss@seegerweiss.com
Christopher M. Van de Kieft
Email: cvandekieft@seegerweiss.com
Parvin K. Aminolroaya
Email: paminolroaya@seegerweiss.com

Attorneys for Defendants